

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TL TOYS HK, LTD.,

Civ. No.: 07 CV 1366 (DAB)

Plaintiff,

-against-

CHRISHA CREATIONS, LTD.,

**NOTICE OF CHRISHA
CREATIONS, LTD.'S
MOTION TO DISMISS**

Defendant.

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PLEASE TAKE NOTICE that Defendant, Chrisha Creations, Ltd., by and through its counsel, Rivkin Radler LLP, shall move this Court before the Honorable Deborah A. Batts, United States District Judge, Courtroom 24B, at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for dismissal of the action in accordance with Fed. R. Civ. P. 12(b)(6) under the "first-filed rule," or, in the alternative, staying the action pending the outcome of the first-filed action commenced by Chrisha Creations, Ltd. in the United States District Court for the District of Rhode Island, and for such other and further relief as the Court deems just, reasonable, and appropriate;

PLEASE TAKE FURTHER NOTICE that Chrisha Creations will rely on the Affirmation of Joseph K. Poe, Esq. and exhibits attached thereto, dated March 29, 2007, and the accompanying Memorandum of Law, dated March 29, 2007, in support of its motion to dismiss; and

PLEASE TAKE FURTHER NOTICE that Chrisha Creations requests oral argument.

Dated: Uniondale, New York
March 29, 2007

Respectfully submitted,

RIVKIN RADLER LLP

By: 

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